## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors. 1

## MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S APPEARANCE AT JANUARY 29-30 OMNIBUS HEARING

COMES NOW AmeriNational Community Services, LLC (hereafter "AmeriNat") as servicer for the GDB Debt Recovery Authority (the "DRA") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding procedures for Attendance, Participation and Observation of January* 29-30, 2020 Hearing (the "Scheduling Order") (Dkt. No. 10254):

1. Nayuan Zouairabani of McConnell Valdés, LLC will appear in person on behalf of AmeriNat at the hearing on January 29-30, 2020 in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico (the "Hearing").

\_

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS(Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Mr. Zouairabani may present argument related to the Objection of Assured Guaranty Corp.,

Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, AMBAC Assurance

Corporation and Financial Guaranty Insurance Company to (i) Response of the Financial Oversight and

Management Board for Puerto Rico to Interim Report and Recommendation of the Mediation Team (ECF

No. 9493), as Incorporated in (ii) Interim Case Management Order for Revenue Bonds (ECF No. 9620)

(Dkt. No. 10251), as well as any other related response thereof.

AmeriNat further reserves the right to present argument, respond, and/or otherwise be 3.

heard, as necessary, as to any other matter identified in the Agenda to be filed by the Oversight Board, as

well as to any statements made at the Hearing by any party on any matters related to the instant Title III

cases.

WHEREFORE, AmeriNat respectfully requests the Court to take note of the foregoing, and deem

AmeriNat in compliance with the Scheduling Order (Dkt. No. 10254).

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of January, 2020.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF

participants in this case, and that we served the foregoing upon all the Standard Parties as identified and defined at ¶ II(A) of the Court's Tenth Amended Notice, Case Management, and Administrative Procedures

(Dkt. No. 8027 of Case No. 17-03283 (LTS)).

MCCONNELL VALDÉS LLC

Attorneys for AmeriNational Community Services, LLC as servicer

for the GDB Debt Recovery Authority

270 Muñoz Rivera Avenue, Suite 7

San Juan, Puerto Rico 00918

Telephone: 787-250-5632

Facsimile: 787-759-9225

By: s/Arturo J. García-Solá

Arturo J. García-Solá

USDC No. 201903

Email: ajg@mcvpr.com

By: <u>s/Nayuan Zo</u>uairabani

Nayuan Zouairabani

USDC No. 226411

Email: nzt@mcvpr.com

2